

UNITED STATES DISTRICT COURT

for the
Middle District of North Carolina

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)

Telecommunication records and information maintained
by Celco Partnership dba: Verizon Wireless for phone
number 919-672-5076 from 6/14/24 through 6/17/24

Case No.

1:24-mj-268

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Telecommunication records and information maintained by Cellco Partnership dba: Verizon Wireless for target phone number 919-672-5076 from June 14, 2024 through June 17, 2024, as described in Attachment "A" located in the _____ District of _____ New Jersey _____, there is now concealed (identify the person or describe the property to be seized):

See Attachment "B"

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
18 U. S. C. 1708
18 U. S. C. 2114

Mail Theft
Robbery of a Postal Employee

Offense Description

The application is based on these facts:

See Attached Affidavit of FBI TFO Nicholas R. Ingram

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

On this day, the applicant appeared before me by reliable electronic means, that is by telephone, was placed under oath, and attested to the contents of this Application for a search warrant in accordance with the requirements of Fed. R. Crim. P. 4.1.

/s/ Nicholas R. Ingram


Applicant's signature

Nicholas R. Ingram, FBI-Task Force Officer

Printed name and title

Date:

07/16/24



Judge's signature

City and state: Greensboro, North Carolina

United States Magistrate Judge L. Patrick Auld

Printed name and title

ATTACHMENT A

PROPERTY TO BE SEARCHED

This warrant applies to records and information associated with TARGET NUMBER 919-672-5076 ("the Account"), that is stored at premises owned, maintained, controlled, or operated by Cellco Partnership dba: Verizon Wireless ("the Provider"), 180 Washington Valley Road, Bedminster New Jersey 07921.

ATTACHMENT B

INFORMATION TO BE SEIZED/DISCLOSED BY THE PROVIDER

To the extent that the information described in Attachment A is within the possession, custody, or control of the Provider, including any information that has been deleted but is still available to the Provider or that has been preserved pursuant to a request made under 18 U.S.C. § 2703(f), the Provider is required to disclose to the government the following information pertaining to the Account listed in Attachment A for the time period of June 14, 2024, through June 17, 2024:

A. The following information about the customers or subscribers of the Account:

1. Names (including subscriber names, user names, and screen names);
2. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
3. All call detail records (CDR) with cell site information for the referenced time period;
4. Local and long-distance telephone connection records;
5. Records of session times and durations, and the temporarily assigned network addresses (such as Internet Protocol ("IP") addresses) associated with those sessions;
6. Length of service (including start date) and types of service utilized;

7. Telephone or instrument numbers (including MAC addresses, Electronic Serial Numbers (“ESN”), Mobile Electronic Identity Numbers (“MEIN”), Mobile Equipment Identifier (“MEID”), Mobile Identification Numbers (“MIN”), Subscriber Identity Modules (“SIM”), Mobile Subscriber Integrated Services Digital Network Number (“MSISDN”), International Mobile Subscriber Identifiers (“IMSI”), or International Mobile Equipment Identities (“IMEI”));
 8. Other subscriber numbers or identities (including the registration Internet Protocol (“IP”) address); and
 9. Means and source of payment for such service (including any credit card or bank account number) and billing records.
- B. All records and other information (not including the contents of communications) relating to wire and electronic communications sent or received by the Account, including:
- i. the date and time of the communication, the method of the communication, and the source and destination of the communication (such as the source and destination telephone numbers (call detail records), email addresses, and IP addresses); and
 - ii. information regarding the cell tower and antenna face (also known as “sectors”) through which the communications were sent

and received as well as per-call measurement data (also known as the “real-time tool” or “RTT” data).

- iii. All usage data, toll records, and cell site locations and sectors for all outgoing and incoming Voice, SMS, MMS, and Data transactions with date, time, direction, duration, and content;
- iv. All available Timing Advance and RTT reports, to include Voice, SMS, 1X, EVDO, LTE, IP session, and Data including cell site information;
- v. Device identifiers (IMEI) for all devices (watches, HUM, tablets, etc.) that are connected/paired to this number/subscriber account; and
- vi. Records of user activity for each connection made to or from the Account, including log files; messaging logs; the date, time, length, and method of connections; data transfer volume; user names; and source and destination Internet Protocol addresses.

This warrant authorizes a review of records maintained by the Provider seized or copied pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts.

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

Telecommunication records and
information maintained by Cellco
Partnership dba: Verizon Wireless
for target phone number 919-672-
5076 from June 14, 2024 through
June 17, 2024

Case No. 1:24-mj-268

**AFFIDAVIT IN SUPPORT OF AN
APPLICATION FOR A SEARCH
WARRANT UNDER FED. R. CRIM. P. 41**

I, Nicholas R. Ingram, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND TASK FORCE OFFICER BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with telephone number 919-672-5076 (TARGET NUMBER), which is stored at premises controlled by Cellco Partnership dba: Verizon Wireless, 180 Washington Valley Road, Bedminster New Jersey 07921.

2. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. § 2703(c)(1)(A) to require Cellco Partnership dba: Verizon Wireless to disclose to the government copies of the information further described in Attachment B.

3. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer

of the United States who is empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18 of the United States Code.

4. I am a Greensboro Police Officer and Federal Bureau of Investigation (FBI) Task Force Officer. I have been sworn as a Greensboro Police Officer since 2005 and further sworn as a FBI Task Force Officer since 2020.

5. I am currently assigned to the Greensboro Police Department Criminal Investigations Division (CID), Robbery Investigations, as well as the Federal Bureau of Investigations' Safe Street Task Force. As a Federal Bureau of Investigation Task Force Officer, I am tasked with investigating various violent crimes including Hobbs Act Violation robberies and robbery of postal employees, in violation of Title 18, United States Code, Section 2114.

6. This affidavit is intended to show that there is sufficient probable cause for the requested warrant. It neither sets forth all of my knowledge about this matter, nor describes every fact known to the government in connection with this investigation.

7. The facts in this affidavit come from my personal observations, my training and experience, information obtained from police reports, other agents, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

8. Based on my training and experience and the facts as set forth in this Affidavit, there is probable cause to believe that evidence of violations of Title 18,

United States Code, Section 2114 (robbery of a postal employee) and Title 18, United States Code, Section 1708 (mail theft). Your Affiant will set forth probable cause to search the locations described in Attachment A for evidence of these crimes further described in Attachment B.

STATUTORY AUTHORITY

9. This investigation concerns violations of Title 18, United States Code, Section 2114(robbery of a postal employee) and Title 18, United States Code, Section 1708 (mail theft).

IDENTIFICATION OF THE RECORDS TO BE EXAMINED

10. Telecommunication records maintained by Cellco Partnership dba: Verizon Wireless for target phone number 919-672-5076 (TARGET NUMBER), believed to belong to CROSS and seized on June 17, 2024, pursuant to an investigation into postal robberies, for the time period of June 14, 2024, through June 17, 2024.

BACKGROUND ON ARROW KEYS, POSTAL ROBBERIES, AND THE EXAMINATION OF TELECOMMUNICATIONS RECORDS

11. I have learned through numerous investigations with the United States Postal Inspection Service (“USPIS”) that the United States Postal Service uses a universal key known as an “arrow key” to service mailboxes in and around specific areas for that key. The arrow key can be identified by “USPS” etched on one side of the key and a seven-digit number on the opposite side of the key. The first two digits help identify the area the key is associated with, and the remaining five digits are specifically assigned to an individual key, or act as a serial number for that key.

Letter carriers are supposed to sign an arrow key out and then back in each day. The arrow key allows access to all blue collection boxes, incoming and outgoing mail at apartment complexes, mobile home parks, business parks, and cluster boxes at the newer residential subdivisions. Arrow keys that are keyed for Greensboro, North Carolina will not work in any city or town within a 50-mile radius.

12. In my experience, I know that people who rob letter carriers for arrow keys or steal arrow keys or purchase arrow keys from letter carriers are doing so to gain access to people's personal and business checks, credit cards, and personal information.

13. In my training and experience, and speaking with other law enforcement officers, cellular telephones are utilized for various communications including but not limited to calls, texts, emails, and third-party applications. It has further been my experience that these communications utilize the cellular telephone company's network to which the device's telephone number is assigned. Telephone calls, texts and data applications access the cellular telephone company's network through use of a physical towers that are erected across the coverage area. Thus, the cellular communications company keeps records of these transactions that can be utilized to determine other telephone numbers called at a certain time, various cellular towers being utilized by the target number at a particular time, and other functions thus providing geographical locations of the device assigned to that TARGET NUMBER. These records also can provide the estimated distance from the cellular tower (Range to tower "RTT" and/or Time and Advance records) further being

able to identify the location of the device utilizing a particular number. These records further identify the subscriber, address associated with the subscriber, and potentially, other telephone numbers assigned to that subscriber which would require additional search warrants to obtain data from.

PROBABLE CAUSE

14. Since November 15, 2023, there have been several postal robberies in the Piedmont Triad area of North Carolina. On November 15, 2023, a robbery of a postal employee occurred in Winston-Salem, North Carolina.

15. Since April 2024, I have investigated or assisted in investigations involving the robbery of United States Postal workers. Specifically, I have investigated the robbery of a United States Postal Worker near Elam Avenue in Greensboro, North Carolina in April of 2024 and the robbery of multiple Postal workers on June 17, 2024, which will be detailed herein. I have assisted or been assisted by the United States Postal Inspection Service during these and other investigations involving the robbery of Postal workers and/or the theft of mail.

Recent Postal Robberies and Subsequent Investigation

16. On June 17, 2024, at approximately 10:10 A.M., in Greensboro, North Carolina, in the Middle District of North Carolina, a United States Postal Service employee was in their marked United States Postal Service vehicle and in their United States Postal uniform on their appointed mail route. The postal employee parked on the 800 block of Glenwood Avenue. An unknown black male dressed in all black ran up to the mail truck from the direction of Haywood Street and pointed a

small black handgun at the postal employee. The suspect said, "give me the key, give me the key." The postal employee gave the unknown black male the key to the postal vehicle that had a Voyager gas card attached. The unknown black male demanded the postal employee get out of the truck. The unknown black male was dressed in all black with the hoodie on his head, a black mask, blue gloves, and distinctive white tennis shoes. The suspect patted the postal employee down checking for the arrow key. When the suspect realized the letter carrier did not have an arrow key, he gave the vehicle key with the Voyager gas card back to the letter carrier. The unknown black male then ran back towards Haywood Street.

17. That same day, on June 17, 2024, at approximately 10:21 A.M., in Greensboro, North Carolina, in the Middle District of North Carolina, a different United States Postal Service employee in uniform and in a United States Postal Service truck was delivering United States Mail in the 100 block of East Carteret Street. An unknown black male dressed in all black ran up to the letter carrier and pointed a small black handgun at the postal employee. The unknown black male demanded the postal employee's key. The postal employee gave the unknown black male the arrow key. The unknown black male ran off in the direction towards S. Elm-Eugene Street. The arrow key serial number that was stolen had a serial number of 74-23198.

18. Greensboro Police Department (GPD), Federal Bureau of Investigation (FBI), and the United States Postal Inspection Service (USPIS) immediately began to investigate the two robberies. Greensboro Police Detectives and FBI Task Force

Officers obtained video surveillance from three businesses. One business was Mother's Murphy, 2826 W Carteret Street, Greensboro, North Carolina 27406. A second business was Park View Inn, 2838 S. Elm-Eugene Street, Greensboro, North Carolina 27406. From the third business, video was obtained where the second armed postal robbery actually occurred, the Park View Inn, 115 East Carteret Street, Greensboro, North Carolina 27406. The video depicted the suspect while he was in the process of robbing the postal worker. The postal worker's marked mail truck can be seen in the background.



19. After reviewing the video surveillance, law enforcement identified a suspect vehicle, a navy-blue Nissan Rogue with North Carolina Vehicle Registration of RHX-3697 (SUSPECT VEHICLE). Law enforcement saw the navy-blue Nissan Rogue (SUSPECT VEHICLE) following the letter carrier vehicle in the different business videos in the area of South Elm-Eugene Street. The vehicle came back as being registered as a rental vehicle from EAN HOLDINGS LLC, Enterprise Rental car. Law enforcement learned that the Suspect Vehicle was rented in Burlington,

North Carolina by an individual whose initials are C. J. that lives in Mebane, North Carolina. In my training and experience, an individual will rent a car, rather than use their own vehicle, in an attempt to obfuscate their identity during criminal activity.



20. The Nissan Rogue with NC Registration RHX-3697 (SUSPECT VEHICLE) became the vehicle of interest in the armed robbery of the second United States Postal Service employee. At 11:57 am, Law enforcement still on scene from the 10:10 A.M. postal robbery reviewed video surveillance from a residence on Glenwood Avenue near the first robbery of the postal employee to see if the SUSPECT VEHICLE was present. A navy-blue Nissan Rogue (the SUSPECT VEHICLE) was seen riding past the letter carrier at approximately 10:10 AM. A few moments later, at 10:11 AM, the video surveillance captured the attempted robbery of the letter carrier on Glenwood Avenue. The video shows an unknown black male suspect dressed in all black run up to the letter carrier and pat the letter carrier down, checking for the arrow key. The suspect can be seen giving the letter carrier the key to the postal vehicle with the Voyager gas card attached back to the letter carrier before running off towards Haywood Street.



(The residential video surveillance camera time is off by approximately 50 minutes).

Law enforcement continued to investigate the two robberies and were able to link the two robberies together by the one suspect and the Suspect Vehicle.

21. That same day, on June 17, 2024, at approximately 1:00 pm, a United States Postal Service Rural Letter Carrier, not in uniform, but operating a marked postal truck, was robbed at gun point in the 12200 block of Lemmond Farm Drive in Mint Hill, North Carolina (Mint Hill is a major suburb on the outskirts of Charlotte), in the Western District of North Carolina, by two unknown black males. According to the letter carrier, they were delivering/collecting mail at the mail building for about 10 minutes when two black males, both wearing black hoodies and ski masks, approached the letter carrier. One pulled a small black handgun from his waistband and demanded her postal keys. When the letter carrier was not moving fast enough, one suspect said, "you are taking too long," and put the gun against the letter carrier's head. When the letter carrier presented the postal key, one suspect grabbed the key from the letter carrier's hand. The suspects fled to a waiting dark blue/black Sports

Utility Vehicle and departed the area at approximately 1:00 pm. The vehicle took a route through the apartment complex before exiting, heading inbound on Albemarle Road. The arrow key stolen in this armed robbery had a serial number of 95-57764.

22. A resident of the Lemmond Farm Drive apartments was interviewed about a speeding sports utility vehicle in the apartment complex. The resident advised close to 1:00 pm they were walking to the pool with their children when they witnessed a sports utility vehicle speeding into the apartment complex. The resident advised that the sports utility vehicle almost hit them and their children. The resident yelled at the SUV to slow down. The resident advised a person in the rear passenger seat let the window down and slightly apologized to them say something like, "sorry mommy." The resident stated that they saw three or four black males in the vehicle all wearing hoodies. The resident said the black male that apologized had a short afro and no dreads. The resident stated the maintenance person also witnessed the incident.

23. The maintenance person was interviewed in reference to the same incident involving a resident almost being hit by a speeding sports utility vehicle. According to the maintenance person, they were outside in the parking lot area working around 1:00 pm when they witnessed a dark blue Nissan Rogue speeding into the parking lot. The maintenance person noticed the vehicle had North Carolina tags but did not get the tag number. The maintenance person heard the resident yell for the vehicle to slow down. The maintenance person noticed someone in the backseat rolled down the window to apologize. The maintenance person stated they

saw four African American males in the vehicle, two in the front seat and two in the back seat. The maintenance person explained they noticed the vehicle left the lot and circled the area a few times before parking across the street within the complex. The maintenance person never saw anyone exit the vehicle or get back into the vehicle. The maintenance person advised the Nissan Rogue left the apartment complex shortly thereafter, again estimating around 1:00 pm.

24. That same day, on June 17, 2024, at approximately 1:25 pm, in the 5000 block of Somerset Hill Lane, Charlotte, North Carolina, in the Western District of North Carolina, a United States Postal Service Letter Carrier in a postal uniform operating a United States Postal Service Postal vehicle was robbed at gun point by two unknown black males. The two unknown black males approached the letter carrier as the letter carrier was standing at the cluster box. One suspect stood on each side of the cluster box. Both suspects were wearing dark clothing. One suspect held a small handgun in his left hand at waist level. The suspect demanded, "gimme the key, gimme the key." The letter carrier removed the arrow key from the cluster box door and gave it to one suspect. The suspects ran to a navy-blue Nissan Rogue, and one got in on the back passenger side and the second suspect got in on the passenger side, unknown location. There was someone driving the vehicle because the vehicle was already in motion when the two suspects ran to the SUV. The vehicle then departed the area heading towards the direction of Interstate 85. Through video surveillance from the area, it was confirmed that the suspects fled in a navy-blue Nissan Rogue. The arrow key stolen in this robbery had a serial number of 95-56832.



Suspects exiting the SUV and walking in direction of victim who is delivering mail at a cluster box (not visible)

25. Following the robbery, the two below images show the suspects running back to the waiting SUV:



The SUV starts rolling before the suspects enter. One suspect enters the rear driver's side door. The second suspect enters a passenger side door before they flee the scene:



26. The information about the two-armed robberies in the Charlotte area was provided to members of the Greensboro Police Department Detectives and the Greensboro Police Department Violent Crimes Reduction Team. Members of the Violent Crime Reduction Team were informed the vehicle was rented out of Burlington, North Carolina by an individual whose initials are C.J. that lives in Mebane, North Carolina, and they decided to set up on Interstate 85 to see if the

vehicle would come back Interstate 85 North heading towards Mebane. Members of the Violent Crimes Reduction Team staged their vehicles along Interstate 85 near Archdale. Shortly afterwards, they observed the SUSPECT VEHICLE traveling North on Interstate 85.

27. At approximately 2:40 pm, officers with the Greensboro Police Department conducted a traffic stop on the 2400 block of Randleman Road on a navy-blue Nissan Rogue with North Carolina Registration RHX-3697 (the SUSPECT VEHICLE). Four suspects were in the vehicle. Immediately upon the suspect vehicle being stopped by law enforcement by activating the blue lights, the suspect in the front passenger seat jumped from the vehicle and ran. At least three Greensboro Police Officers gave chase. The suspect who ran, was later identified as JASON DONDI HARRINGTON, ran east behind an old Rite Aid building (2403 Randleman Road, Greensboro, North Carolina 27406 that is permanently closed), where the keys and handgun were tossed (approximately 357 feet from the vehicle stop). HARRINGTON was attempting to discard a small black handgun when he accidentally shot himself below the waist. HARRINGTON continued to run towards Destiny Church that is located at 2401 Randleman Road (approximately an additional 951 feet), where he was apprehended.

28. The three suspects that remained in the car were arrested immediately upon the SUV being stopped by law enforcement. The driver was identified as DEONTE TYMEL OVERBY. As noted, the front passenger was HARRINGTON, and a black mask with red strips on the side near the eyes and a mouth type print on the

front of the mask were found in the front passenger seat. The rear passenger behind the driver was SHAUN TREMEAL CLARKE, and the rear passenger on the passenger side was TAIJAWAN JAMIR CROSS. CROSS had a ski mask on his person when he was removed from the SUV and arrested. All suspects were charged with two counts of Robbery with a Dangerous Weapon and two counts of Conspiracy to commit Robbery with a Dangerous Weapon in violation of North Carolina General Statute 14-87.

29. All three United States Postal Service arrow keys that were stolen in the commission of the armed robberies on June 17, 2024, were recovered along with a small black handgun in close proximity to each other. The arrow key that was stolen in the armed robbery that occurred at approximately 10:21 am in Greensboro, North Carolina had a serial number of 74-23198. The arrow key that was stolen in the armed robbery that occurred at approximately 1:00 pm in Mint Hill, North Carolina had a serial number of 95-57764. The arrow key that was stolen in the armed robbery that occurred at approximately 1:25 pm in Charlotte, North Carolina had a serial number of 95-56832. All three arrow keys with these serial numbers were on the ground behind the closed business that is located at 2403 Randleman Road, Greensboro, North Carolina 27406. On the ground a few feet away was a small black handgun. When the serial number on the gun was checked in the National Crime Information Center it had been reported stolen out of Durham, North Carolina. All four recovered items were in the direct path that HARRINGTON ran.

30. HARRINGTON was transported to the hospital, underwent surgery, and was held pending charges of two counts to commit Robbery with a Dangerous Weapon and to counts of Conspiracy to commit Robbery with a Dangerous Weapon.

31. Three cell phones were recovered from two of the suspects that were in the vehicle. CLARKE had two cell phones in his possession. HARRINGTON had one cell phone. The cell phones were seized incident to arrest. Two cell phones were left in the Nissan Rogue (SUSPECT VEHICLE).

32. The 2024 navy-blue Nissan Rogue North Carolina Registration RHX-3697 (SUSPECT VEHICLE) was impounded by Casey's Towing and towed to their secured lot that is located at 201 Sussman's Street, Greensboro, North Carolina. The Suspect Vehicle was held for a search warrant. After a search warrant was signed, two more cell phones were recovered from the vehicle one of which being a dark green Apple iPhone in a semi clear case. There was a pair of blue latex gloves recovered from the front passenger door handle. There were some dark clothing and other items that were photographed by law enforcement.

33. While investigating this matter law enforcement learned of two robberies in the Raleigh, North Carolina area of Postal Workers that occurred on June 14, 2024. I made contact with Raleigh Police Department Detective M. J. Krepp who, informed me of their robberies and provided the Raleigh Police reports.

34. Law enforcement learned that on June 14, 2024, at approximately 1:05 pm at 5808 Carretta Court, Raleigh, North Carolina, a postal worker who was seated in their delivery vehicle, was approached by a black male wearing a ski mask and all

dark clothing armed with a firearm. The postal worker reported the suspect demanded his mailbox key and stated "Give me your key don't let me blast you". The postal worker gave the key to the suspect who then fled. Raleigh Police discovered through their investigation that at least two suspects were involved in the robbery. Further, during a canvass of the surrounding area, law enforcement discovered information that the suspect may have fled in a blue four door sedan.

35. On June 14, 2024 at approximately 3:00 pm at 6415 Rosny Road, Raleigh North Carolina, a second robbery of a postal worker was reported to the Raleigh Police Department. The victim postal worker was approached by a "younger" black male wearing all black, a face mask, and armed with a "small compact handgun" and demanded "the key with the gold chain". The postal worker gave the subject the "master key" which was on a gold chain. I have learned that several of the postal workers carry the "master key", which is an arrow key, on a gold metal chain. Once the subject had the key the postal worker reported that the suspect fled the scene.

36. Law enforcement believed these robberies are potentially connected to the Greensboro and Charlotte robberies as they occurred in pairs, the suspect descriptions are similar, the modus operandi for the robberies are similar, and the object sought during the robberies is the same.

Identification of TARGET NUMBER

37. As discussed above, after the search warrant for the 2024 navy-blue Nissan Rogue North Carolina Registration RHX-3697 (SUSPECT VEHICLE) was

signed, two more cellphones—including the dark green one described herein—were seized. After the dark green cellphone was seized, I utilized the “Emergency Call” feature on the Green Apple iPhone seized from the SUSPECT VEHICLE to contact Guilford Metro 911 Communications. This was done while the phone was in a “locked” status therefore making it unable for me to see the contents of the device. Guilford Metro 911 advised that the number appearing for the device was 919-672-5076. This allowed me to uniquely identify this device with the telephone number assigned to same.

38. I then conducted a search for 919-672-5076 in law enforcement databases and noted that the same was assigned to Cellco Partnership dba: Verizon Wireless. Upon learning this I drafted a letter of preservation for the records as described in Attachment B and requested that those records be preserved while a search warrant could be drafted. This was completed to ensure all requested records would still be available upon receipt of an approved search warrant and have not been purged from the carrier’s records.

39. Special Agent Angela Pollard of the United State Postal Inspection Service drafted a search warrant for the dark green-colored iPhone seized from the SUSPECT VEHICLE. The search warrant sought to search the physical device to seize relevant content and information as outlined in Attachment B of that search warrant application. On June 28, 2024, the Honorable Joi Elizabeth Peake, U.S. Magistrate Judge for the Middle District of North Carolina, signed the search warrant, 1:24mj253-1.

40. The signed search warrant was submitted to the Greensboro Police Department Computer Forensics lab on June 28, 2024, so that a search of the device may be conducted.

41. On July 3, 2024, after the service of the search warrant to conduct a search of the device, I again utilized the "Emergency Call" feature of the device to contact Guilford Metro 911. Again, I was advised that 919-672-5076 was the telephone number that appeared for that device.

42. Further, I noted that on June 17, 2024, at the time of Taijawan CROSS'S arrest, he was interviewed by Greensboro Police Department Detective William Tyndall and Sara McAnear. During that interview CROSS was advised of his *Miranda* Rights and had waived the same. After his waiver CROSS provided the telephone number 919-672-5076 and identified that number as his.

43. Based on my knowledge, training, and experience, I know that electronic records are stored by telecommunications companies and often provide historical call records (CDR) as well as data sessions or information about data usage. I also know based on my training and experience that these records when examined with specialized software and examined by the Federal Bureau of Investigation Cellular Analysis Survey Team (C.A.S.T.) can oftentimes identify historical location information of a particular cellular device.

44. In my training and experience, I have learned that Cellco Partnership dba: Verizon Wireless is a company that provides cellular telephone access to the general public. I also know that providers of cellular telephone service have technical

capabilities that allow them to collect and generate information about the locations of the cellular telephones to which they provide service, including cell-site data, also known as “tower/face information” or “cell tower/sector records.” Cell-site data identifies the “cell towers” (i.e., antenna towers covering specific geographic areas) that received a radio signal from the cellular telephone and, in some cases, the “sector” (i.e., faces of the towers) to which the telephone connected. These towers are often a half-mile or more apart, even in urban areas, and can be 10 or more miles apart in rural areas. Furthermore, the tower closest to a wireless device does not necessarily serve every call made to or from that device. Accordingly, cell-site data provides an approximate location of the cellular telephone but is typically less precise than other types of location information, such as E-911 Phase II data or Global Positioning Device (“GPS”) data.

45. Based on my training and experience, I know that Celco Partnership dba: Verizon Wireless is a company that can collect cell-site data about the TARGET NUMBER. I also know that wireless providers such as Celco Partnership dba: Verizon Wireless typically collect and retain cell-site data pertaining to cellular phones to which they provide service in their normal course of business in order to use this information for various business-related purposes.

46. Based on my training and experience, I know that Verizon also collects per-call measurement data, which Verizon also refers to as the “real-time tool” (“RTT”). RTT data estimates the approximate distance of the cellular device from a cellular tower based on the speed with which signals travel between the device and

the tower. This information can be used to estimate an approximate location range that is more precise than typical cell-site data.

47. Based on my training and experience, I know that a wireless provider such as Cellco Partnership dba: Verizon Wireless typically collects and retains information about their subscribers in their normal course of business. This information can include basic personal information about the subscriber, such as name and address, and the method(s) of payment (such as credit card account number) provided by the subscriber to pay for wireless telephone service. I also know that a wireless provider such as Cellco Partnership dba: Verizon Wireless typically collects and retains information about their subscribers' use of the wireless service, such as records about calls or other communications sent or received by a particular phone and other transactional records, in their normal course of business. In my training and experience, this information may constitute evidence of the crimes under investigation because the information can be used to identify the approximate location of the TARGET NUMBER's user and may assist in the identification of co-conspirators and/or victims.

CONCLUSION

48. I submit that this affidavit supports probable cause for a search warrant authorizing the examination of the records maintained by Cellco Partnership dba: Verizon Wireless for telephone number **919-672-5076** described in Attachment A to seek the items described in Attachment B, for evidence related to violations of Title 18, United States Code, Sections 1708 and 2114.

49. Based on the foregoing, I request that the Court issue the proposed search warrant, pursuant to 18 U.S.C. § 2703(c) and Federal Rule of Criminal Procedure 41.

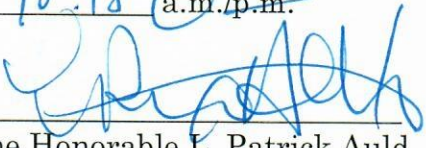
50. I further request that the Court direct Cellco Partnership dba: Verizon Wireless to disclose to the government any information described in Attachment B that is within its possession, custody, or control. Because the warrant will be served on Cellco Partnership dba: Verizon Wireless, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

Respectfully submitted,

//S// Nicholas R. Ingram
Nicholas Ingram
Task Force Officer
Federal Bureau of Investigation

In accordance with Rule 4.1(b)(2)(A), the Applicant appeared before me by telephone, was placed under oath, and attested to the contents of this Affidavit, which was submitted to me by reliable electronic means, on this 16th day of July, 2024, at

10:18 a.m./p.m.


The Honorable L. Patrick Auld,
United States Magistrate Judge
Middle District of North Carolina